

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 07/06/2023

SUBJECT: P/23/0126 | Construction of new single storey detached class room building | Dowlais Primary School Market Street Dowlais Merthyr Tydfil CF48 3HW

Relevant documents submitted in support of the above application:

1. Ty Dysgu, Market Street. Dowlais, Methyr Tydfil, CF48 3HW. Preliminary Ecological Appraisal. Document Ref: WWE22195 PEA REV_B FINAL | 10/03/2023 | Wildwood Ecology Ltd
2. Ty Dysgu Primary School, Market Street, CF48 2 AJ. Drainage Strategy Report (DSR) For: New Build Classrooms. Ref: 16991 – DSR Ro2 Iss2 | Vale Consultancy
3. 2221-02F proposed site plan 15/02/23

COMMENTS

- a) Document 1 states that x3 broad-leaved trees (possibly alder, cherry and/or silver birch) are earmarked to be removed. Document 1 does not include compensation in the form of replacement trees. The woodland trust recommend a planting ratio of at least 3:1 to compensate for a lost tree ([Cutting Down Trees: Law & Legislation - Woodland Trust](#)). The trees earmarked for removal will require compensation planting in line with this recommendation.

Document 3 (proposed site plan) features new tree planting. This would be an opportunity to compensate for the trees earmarked for removal. Native species of local (if not Welsh/UK) provenance will be used. Species that benefit pollinators might be appropriate given that the site is within a Buglife B-Lines area.

- b) There is a small onsite pond. Ponds are a priority habitat (Section 7, Environment (Wales) Act, 2016). Document 1 recommends compensation in the form of a [deeper] replacement pond. This is appropriate and would benefit, for example, invertebrate and amphibian species. As Document 1 also states, this may tie-in with the SuDS requirements for the site. Document 2 features a Drainage Layout plan that includes an Infiltration Basin, which could (in theory) represent compensation for the loss of the pond. Is the basin designed to hold water year round, particularly through the summer months? If not, a smaller pond designed with wildlife in mind will be created onsite. Full details will be required.

- c) As previously referred to above, the site is found within a Buglife B-Lines area. There should also therefore be an area onsite that is managed for wildflowers for the benefit of local invertebrate populations. Full details will be required. NB the larval foodplant for the Marsh Fritillary butterfly – Devil's bit scabious (*Succisa pratensis*) – should be included (NB there are records of both Marsh Fritillary and Devil's bit scabious c.600m to the north east of the site).
- d) Document 2 includes a SuDS planting schedule for both the rain garden feature and the infiltration basin. There is a total of just x7 native species included. This seems a little unambitious as the proposed scheme represents an excellent opportunity to increase onsite biodiversity. Therefore, the range of native species used needs to be dramatically increased. Full details required.
 - o A 25-year Landscape Establishment, Management and Maintenance plan is required. This will include all new planting onsite and should also include (but not be limited to) the information in points a) to d) above. A site plan/drawing will be required.
- e) The integrated bat and bird box as recommended on page 16 of Document 1 will be clearly marked on all relevant architect's plans and elevations.
- f) As referred to in Document 1 (Table 7, page 15) – *"If lighting is required, then a lighting plan will be required taking into account recommendations from BCT/ILP Guidance Note 08/18 to ensure no additional artificial lighting on the stone wall around the north of the site."* NB the lighting plan will also include dark access routes to the wildlife boxes (point e)).
- g) If there are to be any new boundary features, gaps (13cm x 13cm) will be included at ground level to allow free passage of hedgehogs through the site.